



May 24, 2007

Ms. Tracie Billington  
California Department of Water Resources  
Division of Planning and Local Assistance  
P.O. Box 942836  
Sacramento, CA 94236-0001

Dear Ms. Billington:

The San Diego Regional Water Management Group (RWMG) appreciates the opportunity to submit written comments on the Proposition 50, Chapter 8, Integrated Regional Water Management Grant Program Guidelines Proposal Solicitation Package (PSP) Round 2, dated April 2007. Following are some key areas where we are seeking clarification or revisions:

1. **Fiscal Statement Requirements.** As referenced in Section V. Proposal Selection, J. Grant Agreement, we are recommending that only the Grantee Agency submit copies of its most recent three years of audited financial statements. Since the Grantee Agency is the contractually responsible agency, only its financial statements should be requested. As for the Grantee Agency, we are recommending that more than one Grantee Agency per region be recognized by DWR to enter into Agreement with DWR.
2. **Eligibility of Incurred Project Costs.** As referenced in Section V. Proposal Selection, L. Reimbursement of Costs, DWR is recommending that project costs incurred after March 20, 2007, and prior to the effective date of a grant agreement, not be eligible for reimbursement. However, at the discretion of the Granting Agency, these funds can be considered a part of the applicant's funding match. We recommend that all project costs incurred after an applicant is invited to submit an Implementation Grant, Step 2 proposal, be eligible for grant funding.
3. **Groundwater Plan Preparation Timeline.** As referenced in Section III. Eligibility Requirements, B. Eligibility Criteria, Groundwater Management Plan Compliance is required for groundwater management and recharge projects, and for projects with potential groundwater impacts. We recommend that a Groundwater Management Plan be required only when "significant" impacts to

water quality affect the beneficial uses of the water basin. We also recommend that an agency submitting a groundwater management project be given two years to complete its Groundwater Management Plan following submittal of the grant application

4. **Political Jurisdictions and Boundaries Description Definition.** Under the Regional Description IRWM Plan Standards, include a description of Political Jurisdictions and Boundaries. While we understand that DWR is encouraging inter-jurisdictional cooperation, in some cases, clear political boundaries exist that explain why a defined region is an appropriate area for integrated regional water management planning
5. **Disadvantaged Communities Definition.** Under Appendix C, Attachment 4. Disadvantaged Communities – Environmental Justice, is DWR specifically requesting that agencies apply either 2000 vs. 2003 census data for defining the annual Median Household Income (MHI) levels? We are prepared to specify which MHI standard we will be using in our IRWM Plan.

If we can help provide specific language changes, please contact Mark Stadler, Principal Water Resources Specialist at (858) 522-6741, or Maria Mariscal, Senior Water Resources Specialist at (858) 522-6746, and we will be happy to be of assistance.

Sincerely,

Ken Weinberg  
Director of Water Resources  
San Diego County Water Authority  
On behalf of the San Diego Regional Water  
Management Group

cc: Jeff Pasek, City of San Diego  
Jon Van Rhyn, County of San Diego  
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